

# U M G

## UTILITY MANAGEMENT GROUP

GREG MAY

606-437-4754

February 20, 2012

The Honorable Julius Genachowski, Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: LightSquared Docket No. 11-109

Dear Chairman Genachowski:

I write to express my formal comments on LightSquared's Petition for Declaratory Ruling, now pending before the FCC, and to also ask the FCC, now that it has revoked the waiver under which LightSquared had operated, to seek some solution which would allow LightSquared to build its revolutionary 4G network.

As president and CEO of Utility Management Group, a firm which specializes in managing rural public works projects, such as water and sewage systems throughout Eastern Kentucky, I understand the need for better internet service and cell service in the mountains. The FCC's decision to revoke LightSquared's waiver is a terrible setback to a company that would like to spend over \$14 billion in helping our nation become more competitive with the world.

The problem with utility business is that you need utilities everywhere. The mountains of Kentucky are home to millions of people, all of whom need basic water and sewer services, even if they live far from town. It is sometimes difficult to believe that my company can maintain physical water lines in places that radio waves apparently can't reach. Most of the places that my workers are required to go to service our lines are without any sort of cell phone service, and there is no reliable wireless broadband service in any of the region. LightSquared had planned to serve as many as 260 million customers by 2015, plans that now apparently will have to go back to the drawing board.

This decision appears to be based on politics, not science. I work with governments throughout Eastern Kentucky, and so I understand that the goals of local government in Kentucky are the same as the goals of the FCC. The FCC has said that it supports universal broadband and cellular telephone coverage for rural America, and as someone who travels through rural Kentucky on an almost daily basis, you are correct that this is an important goal.

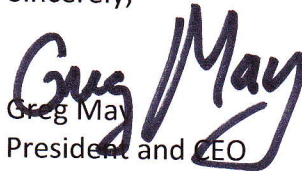
**158 TOWN MOUNTAIN ROAD • PIKEVILLE, KENTUCKY 41501**

LightSquared will market its services through a network of small retailers, which will provide jobs in the rural areas they serve, and will create competition in the market. We need to use all of our bandwidth in order to be competitive in today's economy. It is easy for a utility man to understand: We need bigger pipes for our information. The only way to get those bigger pipes is to use every bit of our spectrum resources.

LightSquared has had regulatory approval to take every step, and everyone has been on notice of exactly what LightSquared has been doing.

It appears that only LightSquared is in a position to help meet all of the FCC's goals without expending any taxpayer funds, or undercutting our economy in any way. In fact, LightSquared's plan to market its services through independent dealers will both increase competition in the areas in which I work, but will help create jobs there as well. These are areas that desperately need jobs. I urge you to grant the relief sought in LightSquared's Petition, and allow it to help rural America. I also urge you to come up with some type of compromise that would allow it to build its system even if the bandwidth on which it now proposes to operate is truly unavailable to it.

Sincerely,

A handwritten signature in dark ink that reads "Greg May". The signature is stylized with a large, looped "G" and a cursive "May".

Greg May  
President and CEO  
Utility Management Group

Copies to:

Sen. Mitch McConnell  
Sen. Rand Paul  
Rep. Hal Rogers  
Rep. Ben Chandler  
Rep. Ed Whitfield  
Mr. Lawrence E. Strickling, NTIA